

SAMPSON & ASSOCIATES
Bryan D. Sampson (#143143)
Elizabeth Aronson (#167869)
2139 First Avenue
San Diego, California 92101
(619)557-9420 / Fax (619)557-9425

5 Attorneys for SECURED CREDITOR
BRADLEY PROULX

CLERK, U.S. BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA
FEB 11 1984

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA**

10 In re: Case No. 99-33191-B7

11 SARA NEWSOME BURNS, Adv. No: 01-90355-B7

12 Debtor. Chapter 7

RICHARD KIPPERMAN, Trustee,

Bivariate

READERS' CHOICE

Plaintiff,

BRADLEY PROULX, an individual.

**NOTICE OF ADDENDUM TO CROSS-
APPEAL**

TO THE CLERK OF THE COURT:

PLEASE TAKE NOTICE that attached hereto is a true and correct copy of the Judgment entered by the Court on January 7, 2002. The document was not available at the time of the filing of the Cross-Appeal.

Respectfully submitted,

SAMPSON & ASSOCIATES

DATE: January 17, 2002

By:

BRYAN D. SAMPSON, ESQ.
Attorney for Secured Creditor
BRADLEY PROULX

1 **SAMPSON & ASSOCIATES**
 2 Bryan D. Sampson (#143143)
 3 Elizabeth Aronson (#167869)
 4 2139 First Avenue
 5 San Diego, California 92101
 6 (619)557-9420 / Fax (619)557-9425
 7
 8 Attorneys for Creditor
 9 **BRADLEY PROULX**

ENTERED	JAN - 7 2002
FILED	
JAN - 4 2002	
CLERK U.S. BANKRUPTCY COURT	
SOUTHERN DISTRICT OF CALIFORNIA	
EY	12 DEPUTY

7
 8 **UNITED STATES BANKRUPTCY COURT**
 9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 In re:	CASE NO. 99-33191-B7
11 SARA NEWSOME BURNS,	Debtor
13 RICHARD KIPPERMAN, Trustee	Adv. No.: 01-90355-B7
14 Plaintiff,	Chapter 7
15 v.	JUDGMENT
16 BRADLEY PROULX, an individual	Date: December 17, 2001
17 Defendant.	Time: 2:30 p.m.
	Ctrm: 4
	Judge: Hon. Peter W. Bowie

1
 2 Defendant/Creditor BRADLEY PROULX's Motion for Summary Judgment came for hearing
 3 against Plaintiff/Chapter 7 Trustee RICHARD KIPPERMAN on the above date and time, the Honorable
 4 Peter W. Bowie presiding. Creditor BRADLEY PROULX appeared through his counsel, Elizabeth
 5 Aronson. Trustee RICHARD KIPPERMAN was present and appeared through his counsel, L. Scott
 6 Keehn. Upon reviewing the pleadings filed by the parties and hearing oral argument presented by both
 7 parties and awarding summary judgment in favor of Judgment Creditor BRADLEY PROULX;

8
 9 The court's findings of fact and conclusions of law were stated orally by the Court, and recorded
 10 in open session, following the close of argument, and are incorporated herein by this reference pursuant
 11 to Rules 7052 and 9014 of the Federal Rules of Bankruptcy Procedure and Rule 52(a) of the Federal
 12 Rules of Civil Procedure.

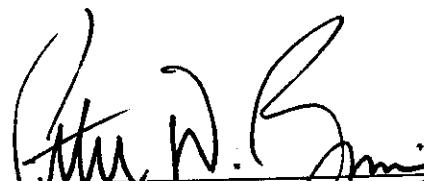
1-7-02
 ENTERED IN JUDGMENT BOOK
 VOLUME 1 / PAGE 26

1 IT IS SO ORDERED that Defendant/Creditor BRADLEY PROULX shall have judgment
2 against the bankruptcy estate of Chapter 7 Debtor Sara Newsome Burns.

3 IT IS HEREBY FURTHER ORDERED that the amount of Defendant/Secured Creditor
4 BRADLEY PROULX's secured claim as of the date of the petition of August 11, 1999, in the amount
5 of the \$150,000.00 cash fund, as defined in the complaint, plus interest accrued thereon.

6 **IT IS SO ORDERED.**

7
8 DATED: JAN - 4 2002



Judge, United States Bankruptcy Court

10 NOTICE: Signature by the attorney constitutes a certification under Federal Rule of Bankruptcy
11 Procedure 9011 that the relief provided by the Order is the relief granted by the Court.

12 Submitted by:

13 January 4, 2002



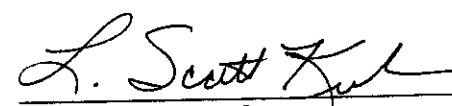
Bryan D. Sampson, Esq.

14
15 Approved as to form

16 DATED: 1-4-02

ROBBINS & KEEHN

17 By:
18
19
20



L. Scott Keehn, Esq.
Attorney for Plaintiff and
Chapter 7 Trustee Richard Kipperman

21
22
23
24
25
26
27
28

CSD 3010 [04/28/96]
 Name, Address, Telephone No. & I.D.
SAMPSON & ASSOCIATES
 Bryan D. Sampson, Esq. (#143143)
 Elizabeth Aronson, Esq. (#167869)
 2139 First Avenue
 San Diego, CA 92101
 Tel: (619) 557-9420
 Fax: (619) 557-9425

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA
 325 West "F" Street, San Diego, California 92101-6991

In Re SARA NEWSOME BURNS	Debtor.	BANKRUPTCY NO. 99-33191-B7
RICHARD KIPPERMAN, Trustee	Plaintiff(s)	ADVERSARY NO. 01-90355-B7
v. BRADLEY PROULX, an individual	Defendants(s)	

PROOF OF SERVICE

I, Robin D'Orazio, certify that I am, and at all times during the service of process was, not less than 18 years of age and not a party to the matter concerning which service of process was made. I further certify that I served a copy of the following documents: Notice of Addendum to Cross-Appeal

on January 17, 2002 by:
 [date]

Mail Service - Regular, first class United States mail, postage fully pre-paid, addressed to:

L. Scott Keehn, Esq.
ROBBINS & KEEHN
 530 "B" Street, Ste. 2400
 San Diego, CA 92101

U.S. Trustee
 Department of Justice
 402 West Broadway, Suite 600
 San Diego, CA 92101

Personal Service - By leaving the documents with the following named person(s) or an officer or agent of the person(s) at:

Residence Service - By leaving the documents with the following adult at:

Under penalty of perjury, I declare that the foregoing is true and correct.

1-17-02

[Date]



[Signature]

Print Name	Robin D'Orazio
Business Address	SAMPSON & ASSOCIATES 2139 First Avenue
City, State, ZIP	San Diego, CA 92101